

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**U.S. BANK N.A., AS TRUSTEE FOR THE  
REGISTERED HOLDERS OF MASTR  
ASSET BACKED SECURITIES TRUST,  
2006-AM1, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES  
2006-AM1**

**Plaintiff,**

**v.**

**VENISSA FORD A/K/A VENISSA  
MOSLEY, JASON MOSLEY, QUINTEN  
TYLER, CHERYL AHAMBA, BERNAL  
LINDSEY, BERMOINE LINDSEY, JR.,  
DESTINY ROSS, JERMOINE LINDSEY,  
ELAINE JACKSON A/K/A ELAINE  
JACKSON LINDSEY, AS NEXT-  
FRIEND OF A.L., A MINOR, ADRAIN  
LINDSEY, MARCUS LINDSEY, AND  
DIANA LINDSEY**

**Defendants.**

**Civil Action No. 4:22-cv-3499**

**PLAINTIFF'S MOTION TO CONTINUE INITIAL  
PRETRIAL SCHEDULING CONFERENCE**

COMES NOW, U.S. Bank N.A., As Trustee for the Registered Holders of MASTR Asset Backed Securities Trust, 2006-AM1, Mortgage Pass-Through Certificates, Series 2006-AM1 ("U.S. Bank" or "Plaintiff"), and files this *Motion to Continue Initial Pretrial Scheduling Conference* ("Motion") and shows unto the Court as follows:

1. Plaintiff filed its *First Amended Complaint* ("Complaint") on December 7, 2022, against Venissa Ford a/k/a Venissa Mosley; Jason Mosley; Quentin Tyler; Cheryl Ahamba; Bernal Lindsey; Bermoine Lindsey; Jr.; Destiny Ross; Jermoine Lindsey; Elaine Jackson, as next-friend

of A.L., a minor; Adrain Lindsey; Marcus Lindsey; and Diana Lindsey (“Defendants”). [ECF Doc. No. 6.]

2. On December 9, 2022, a Summons was issued on all Defendants [ECF Doc No. 7.]

3. On December 20, 2022, Defendant Venissa Ford a/k/a Venissa Mosley was served; and on January 11, 2023, Plaintiff filed a copy of the executed Summons. [ECF Doc. No. 10].

4. Defendant Venissa Ford a/k/a Venissa Mosley has not responded or otherwise appeared in this matter. The deadline for Defendant Venissa Ford a/k/a Venissa Mosley to respond was January 10, 2023.

5. Plaintiff is preparing a Motion for Clerk’s Entry of Default against Defendant Venissa Ford a/k/a Venissa Mosley and a Motion for Default Judgment against Defendant Venissa Ford a/k/a Venissa Mosley to be filed with this Court.

6. Defendants Jason Mosley; Quentin Tyler; Cheryl Ahamba; Bernal Lindsey; Bermoine Lindsey; Jr.; Destiny Ross; Jermoine Lindsey; Elaine Jackson, as next-friend of A.L., a minor; Adrain Lindsey; Marcus Lindsey; and Diana Lindsey are in the process of being served. Plaintiff is awaiting the returns of executed Summons on each of the foregoing Defendants.

7. Plaintiff respectfully requests a continuance of the initial pretrial scheduling conference in order for Plaintiff to file its Motion for Clerk’s Entry of Default against Defendant Venissa Ford a/k/a Venissa Mosley and a Motion for Default Judgment against Defendant Venissa Ford a/k/a Venissa Mosley, and for Plaintiff to perfect service on process on Defendants Jason Mosley; Quentin Tyler; Cheryl Ahamba; Bernal Lindsey; Bermoine Lindsey; Jr.; Destiny Ross; Jermoine Lindsey; Elaine Jackson, as next-friend of A.L., a minor; Adrain Lindsey; Marcus Lindsey; and Diana Lindsey.

8. The requested continuance is not sought for purposes of delay, but so that justice may be done.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Court grant this Motion to continue the initial pretrial scheduling conference to allow for Plaintiff to file its motion for default judgment against Defendant Venissa Ford a/k/a Venissa Mosley, and for Plaintiff to perfect service on process on Defendants Jason Mosley; Quentin Tyler; Cheryl Ahamba; Bernal Lindsey; Bermoine Lindsey, Jr.; Destiny Ross; Jermoine Lindsey; Elaine Jackson, as next-friend of A.L., a minor; Adrain Lindsey; Marcus Lindsey; and Diana Lindsey. Plaintiff further requests all other relief to which it may be entitled.

Respectfully submitted,

By: /s/ Sarah Sibley Cox  
**MARK D. CRONENWETT**  
Attorney in Charge  
Texas Bar No. 00787303  
Southern District Admission #21340  
mcronenwett@mwzmlaw.com

**SARAH SIBLEY COX**  
Of Counsel  
State Bar No. 24043439  
Southern District Admission #39086  
scox@mwzmlaw.com

**MACKIE WOLF ZIENTZ & MANN, P. C.**  
14160 North Dallas Parkway, Suite 900  
Dallas, TX 75254  
Telephone: (214) 635-2650  
Facsimile: (214) 635-2686

**ATTORNEYS FOR PLAINTIFF**